

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE - WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE
TATE, JEREMY S. MELTON, ISSACCA POWELL,
KEITH BURGESS, TRAVIS BOYD, TERRENCE
DRAIN, and KIMBERLY ALLEN on behalf of
themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former
Sheriff of Shelby County, Tennessee; FLOYD BONNER,
JR., in his official capacity as Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual capacity
as former Jail Director of Shelby County, Tennessee;
KIRK FIELDS, in his official capacity as Jail Director of
Shelby County, Tennessee; CHARLENE McGHEE, in
her individual capacity as former Assistant Chief of Jail
Security of Shelby County, Tennessee; REGINALD
HUBBARD, in his official capacity as Assistant Chief of
Jail Security of Shelby County, Tennessee; DEBRA
HAMMONS, in her individual capacity as former
Assistant Chief of Jail Programs of Shelby County,
Tennessee; TIFFANY WARD in her official capacity as
Assistant Chief of Jail Programs of Shelby County,
Tennessee; SHELBY COUNTY, TENNESSEE, a
Tennessee municipality; TYLER TECHNOLOGIES,
INC., a foreign corporation; GLOBAL TEL*LINK
CORPORATION, a foreign corporation; SOFTWARE
AG USA, INC., a foreign corporation; and SIERRA-
CEDAR, INC., a foreign corporation, SIERRA
SYSTEMS GROUP, INC., a foreign corporation.

Defendants.

**Case No. 2:16-cv-2907-
SHM/tmp**

**MOTION TO EXTEND
CLASS CERTIFICATION
BREIFING DEADLINES**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV.
PRO. 38(a) & (b)**

**DECLARATION OF F. SCOTT CONAWAY
CONFIRMING DELIVERY OF SUPPLEMENTAL
INFORMATION TO STATE ATTORNEYS GENERAL**

I, F. Scott Conaway, being duly sworn, depose and say under oath as follows:

1. My name is F. Scott Conaway, and I am an adult resident and citizen of the State of Tennessee. I am the managing member of CMM Settlement Solutions, LLC (hereinafter “CMM”), which was retained by class counsel (with approval of defense counsel) in the above styled case to send notice pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. §1711 (hereinafter “CAFA Notice”) to the relevant Attorneys General of those states where a putative class member might reside and might potentially be impacted by the parties’ proposed settlement. I am responsible for supervising all class action administration services provided by CMM, was personally involved in sending the CAFA Notice and, therefore, have personal knowledge of the facts set forth herein below.

2. I filed a Declaration of May 11, 2021, with this Court confirming that the CAFA Notice (including all exhibits) was delivered by Federal Express to each office of the forty-one (41) Attorneys General described above. On August 31, 2021, class counsel and defense counsel requested that CMM send those Attorneys General certain supplemental information, including this Court’s Order preliminarily approving this proposed Class Action Settlement and setting deadlines in the case. A true and accurate copy of the supplemental information provided is attached hereto as **Exhibit A**.

3. On September 2, 2021, CMM delivered **Exhibit A** via Federal Express to each Attorneys General as requested by counsel. Attached hereto as **Exhibit B** is a list of tracking numbers and dates and times of receipt of the supplemental information by each of the forty-one (41) Attorneys General. As **Exhibit B** demonstrates, the supplemental information was delivered, and received by each of the forty-one (41) Attorneys General described in the heading of the letter by the close of business on September 7, 2021. CMM has not received any type of objection, complaint, or correspondence from any Attorneys General regarding this case.

4. CMM has maintained (and will maintain) all the original shipping labels and the delivery receipts with signatures and can produce this documentation upon request.

I, F. Scott Conaway, declare under penalty of perjury that the foregoing is true and correct.



F. SCOTT CONAWAY

EXECUTED ON: 10/29/21